

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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DR. DELOIS BLAKELY, BISHOP SHIRLEY
PITTS, MS. MARGARET CALLENDER

Plaintiff(s)

Vs.

NEW YORK CITY CORPORATION COUNSEL,
MICHAEL A. CORDOZO; NEW YORK CITY
CORPORATION ASSISTANT COUNSEL,
LESLIE SPITALNICK; 100 CHURCH STREET,
NY, NY 10007; MARTHA E. STARK, NY CITY
COMMISSIONER OF FINANCE, 66 JOHN
STREET, 3RD FLOOR, NEW YORK, NY 10038;
SHAUN DONOVAN, NY CITY HPD
COMMISSIONER THE CITY OF NEW YORK
DEPARTMENT OF HOUSING PRESERVATION
& DEVELOPMENT HPD, 100 GOLD STREET,
ROOM 1R, NEW YORK, NY 10038; MYRIAM
ELLIS, IN HER OFFICIAL CAPACITY AS HPD
REPRESENTATIVE, 100 GOLD STREET, ROOM
1R, NEW YORK, NY 10038; MARK MATTHEW,
100 GOLD STREET, ROOM 1R, NEW YORK, NY
10038

Defendant(s)

**DEFENDANTS' NOTICE OF
MOTION**

**07 CV 3951
(DC)**


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PLEASE TAKE NOTICE, that upon the Declaration of Assistant Corporation Counsel CHRISTINA L. HOGGAN, dated June 26, 2007, and the exhibits annexed thereto, and upon Defendants' Memorandum of Law, dated June 26, 2007, and upon all of the papers, pleadings, and proceedings heretofore had and filed herein, the undersigned will move this Court at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York for an order pursuant to F.R.C.P. Rule 12(b)(6) dismissing the complaint, together with such other and further relief as the Court deems just, fair and equitable.

PLEASE TAKE FURTHER NOTICE, pursuant to S.D.N.Y. Civ. R. 61,
answering papers are to be served within ten business days after service of the moving papers.

Dated: New York, New York
June 29, 2007

MICHAEL A. CARDOZO
Corporation Counsel of the
City of New York
Attorney for Defendants
100 Church Street, Room 5-154
New York, New York 10007
(212) 788-0461

By:


CHRISTINA L. HOGGAN
(CH 6877)
Assistant Corporation Counsel

To:

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DEFENDANTS' NOTICE OF MOTION	
MICHAEL A. CARDOZO <i>Corporation Counsel of the City of New York</i> <i>Attorney for Defendants</i> <i>100 Church Street</i> <i>New York, N.Y. 10007</i> <i>Of Counsel: Christina L. Hoggan</i> <i>Tel: (212) 788-0461</i> <i>NYCLIS No.</i>	
Due and timely service is hereby admitted.	
New York, N.Y.	200 . . .
Esq.	
Attorney for . . .	